

ARCO Aluminum
ARCO Metals Company

Internal Correspondence

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M. T. BOULTINGHOUSE
MAY 6 1986

Date: May 6, 1986
Subject: Environmental Issues at Columbia Falls

FILE _____

From/Location: S. K. Das
To/Location: M. T. Boultinghouse

REFERENCE: Letter by D. L. Stieghan to Bradford/Kaufmann/
Hindin/Sneddon - Dated December 21, 1984
Subject: Due Diligence Review Report -
Columbia Falls Operations

Based upon my discussions with Bob Sneddon and Jack Goldman (an environmental expert at The Aluminum Association), here are my comments on the captioned letter.

- (1) Regulatory Activities - There have been no safety or environmental citations at the facility since September 1981.
- (2) Workers Compensation - There are no issues since the facility is self-insured. A review of current open claims does not reveal any trends for increased claims due to occupational diseases. There is no reason to expect a sharp rise in claims for alleged occupational injury and illness.
- (3) Fire Protection - There are no issues.
- (4) Workplace Safety and Health - There are no issues.
- (5) Hazard Communications - There are no issues.
- (6) Toxics - There have been no complaints about the past sales of used oils concerning PCB contamination. All recent oil shipments have been analyzed for PCB and their concentrates are well within EPA guidelines. This is not an issue at this time.
- (7) Medical - The plant under Arco ownership had a nurse and physician assistant during the day and EMT the other times. Now the plant has only EMT - trained security guards. Nevertheless, this is not an issue at this time.
- (8) Emissions and Effluents - There are no issues.

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(9) Wastes

- (a) Arrcom Oil - no issue.
- (b) Jerry's Waste Oil Service - no issue.
- (c) Enviro-Safe Service - no issue.
- (d) Enasco, Inc. - no issue.
- (e) Beaver Wood Products - no issue.
- (f) Non-Hazardous Waste Landfills - no issue.

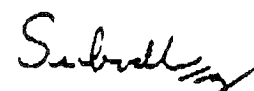
10. Spent Cathode Landfills - Spent cathode waste was listed as hazardous waste in 1980. However, it has been de-listed as hazardous waste since 1981. Based upon on-going discussions between EPA and The Aluminum Association, representing the domestic aluminum companies since October 1985, it is possible that spent cathode could again be relisted as hazardous waste in October 1986. If relisting does occur, then aluminum companies will have one year to comply with EPA approved waste management for "new" spent cathode material. The most likely treatment of "old" spent cathode material is the "grandfather clause" as long as the "old" material is not contaminating the ground well water.

The regular sampling of well water from the 2 closed landfills containing spent cathode at Columbia Falls indicate no environmental problems. Hence, they are likely to be granted the "grandfather clause" as long as continued water sampling results are normal.

The currently operating spent cathode landfill was constructed in "late 1980" and used accordingly with then effective EPA land disposal standards. The site has been routinely monitored with no environmental problems. Bob Sneddon made a survey of the spent cathode landfill site on September 17, 1985 and found the site in good condition.

In summary, the closed and existing spent cathode landfill sites at Columbia Falls are in good shape as long as we continue to monitor the underground water wells for any potential problems.

- (11) Calcium Fluoride Sludge Pond - There are no issues.


S. K. Das